

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

RECEIVED

TRACY DEBOSE LAMPKIN,

Plaintiff

v.

UNITED PARCEL SERVICE, INC,

Defendant.

CIVIL ACTION NO.
1:06-CV-538-WKW

2008 APR 22 A 10:11

DEBRA P. HACKETT, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

JOINT MOTION TO CONTINUE PRETRIAL CONFERENCE AND TRIAL

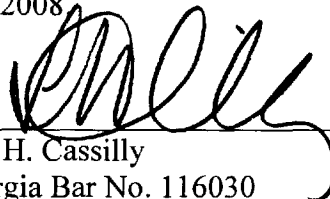
Plaintiff Tracy Debose Lampkin and United Parcel Service, Inc. jointly move the Court to continue the pretrial conference and trial date in this action. By Order dated September 13, 2007, the Court set the pretrial conference for April 21, 2008 and the trial for May 19, 2008. Thereafter, the period of time within which the Parties had to complete discovery and to submit dispositive motions was extended by Order dated October 30, 2007. The Parties completed discovery and on December 21, 2007, Defendant UPS filed its Motion for Summary Judgment on all claims by Plaintiff. Plaintiff was granted an extension of time to respond and filed her opposition papers on February 1, 2008. UPS filed its Reply Brief in Support of its Motion for Summary Judgment on February 15, 2008. In the interest of judicial economy and to allow opportunity for the Court to review and rule upon the pending dispositive motion, the Parties respectfully request that the pretrial conference be continued to a date thirty (30) days following a final ruling by the District Court on Defendant's Motion for Summary Judgment, and, if necessary, that the trial be scheduled thereafter.

Respectfully submitted this 14 day of April, 2008



Crystal M. James
Crystal James & Associates, LLC
8451 S. Cherokee Blvd., Suite F
Douglasville, GA 30134

Attorney for Plaintiff



Lisa H. Cassilly
Georgia Bar No. 116030
Jeremy D. Tucker (TUC037)
ALSTON & BIRD LLP
1201 West Peachtree Street
Atlanta, Georgia 30309-3424
Tel. No. (404) 881-7000
Fax No. (404) 881-7777
1201 West Peachtree Street
Atlanta, Georgia 30309-3424

Donald R James (by Lisa Cassilly with express permission)
William J. Baxley (BAX 001)
Donald R. James, Jr. (JAM016)
BAXLEY, DILLARD, DAUPHIN & McKNIGHT
2008 3rd Avenue South
Birmingham, Alabama 35233
Tel. No.: (205) 939-0995
Fax No.: (205) 271-1108

Attorneys for Defendant